

HONORABLE TIMOTHY W. DORE

HEARING DATE: FRIDAY, SEPTEMBER 23, 2011  
HEARING TIME: 9:30 A.M.  
LOCATION: SEATTLE, COURTROOM 8106  
RESPONSE DUE: FRIDAY, SEPTEMBER 16, 2011

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

MARK FOXTON MARING, individually and as  
successor in interest to F/V TIGER, INC.; FRANCES  
M. INC.; MARK F. MARING ENTERPRISES II,  
INC.; POLMAR FISHERIES INC.; POLMAR  
INTERNATIONAL INC.; POLMAR  
INTERNATIONAL I, LLC, all Washington  
companies,

Debtors.

In re

BLUE ICE, INC.,

Debtor.

In re

DESTINY SEAFOODS LLC,

Debtor.

In re

EAGLE INC.,

Debtor.

**Lead Case No. 06-12691-SJS**

(06-12681, 06-12688, 06-12684, 06-12682,  
06-12683, 06-12687, 06-12689, and 06-  
12690)

BUSH STROUT & KORNFELD LLP'S  
MOTION FOR LEAVE TO WITHDRAW  
AS COUNSEL FOR CREDITORS PG  
ALASKA CRAB INVESTMENT CO.,  
LLC, NORTHERN ORION II, INC. AND  
PADILLI, LLC

BUSH STROUT & KORNFELD LLP'S MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL FOR CREDITORS PG ALASKA  
CRAB INVESTMENT CO., LLC, NORTHERN ORION II, INC.  
AND PADILLI, LLC – Page 1

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LAW OFFICES

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1 In re  
2 MARK MARING II, INC.,  
3 Debtor.

4 In re  
5 NORTHERN ORION, INC.,  
6 Debtor.

7 In re  
8 NORTHLAND FISHERIES, INC.,  
9 Debtor.

10 In re  
11 ORION FISHERIES INC.,  
12 Debtor.

13 In re  
14 SITKIN ISLAND INC.,  
15 Debtor.

16 Bush Strout & Kornfeld LLP (“BSK”) moves the Court pursuant to General Rule 2(g)(4)(A)  
17 of the Local Rules for the Western District of Washington (“Local Rules”) for entry of an order  
18 authorizing it to withdraw as counsel for creditors PG Alaska Crab Investment Co., LLC, Northern  
19 Orion II, Inc. and Padilli, LLC (collectively, “PGA”), creditors in the above-captioned bankruptcy  
20 cases (together, the “Maring Bankruptcies”). This motion is based upon the files and records herein  
21 and the accompanying Declaration of Christine M. Tobin-Presser (“Tobin-Presser Decl.”).

22 The above-captioned debtors filed voluntary Chapter 7 bankruptcy petitions on August 11,  
23 2006. BSK appeared on behalf of PGA in the Maring Bankruptcies in August 2006.

On December 16, 2008, the Court entered an order approving a settlement agreement between  
PGA and the Chapter 7 Trustee in the Maring Bankruptcies. See Docket No. 205. On February 12,

2009, the Court entered an Order Allowing and Subordinating Claims of Padilli, LLC and PG Alaska Crab Company, Inc. See Docket No. 218.

As of the entry of the two orders described above, BSK's work on behalf of PGA was substantially concluded. PGA has owed BSK a substantial balance for BSK's work since prior to June 2009. BSK's numerous attempts to obtain payment on this balance have been unsuccessful, as described in the Tobin-Presser Declaration.

BSK has notified PGA of its intent to withdraw as its counsel in the Maring Bankruptcies. Pursuant to GR 2(g)(4)(B) of the Local Rules, BSK has advised PGA that as business entities, the three entities comprising PGA are required by law to be represented by an attorney admitted to practice before this Court. BSK therefore requests authorization to withdraw as counsel for PGA in the Maring Bankruptcies.

DATED this 18<sup>th</sup> of August, 2011.

BUSH STROUT & KORNFELD

By /s/ Christine M. Tobin-Presser  
Christine M. Tobin, WSBA #27628  
Gayle E. Bush, WSBA #07318  
Attorneys for PG Alaska Crab Investment Co.,  
LLC; Northern Orion II, Inc.; and Padili, LLC